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*Attorneys for Defendant Facebook, Inc.,*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF ALEXANDER  
SWANSON IN SUPPORT OF  
FACEBOOK'S STATEMENT IN  
SUPPORT OF ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
SPECIAL MASTER'S ORDER RE:  
BUSINESS PARTNERS**

I, Alexander Swanson, hereby declare as follows:

1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bar of California. I submit this declaration in support of Facebook’s Statement In Support Of Administrative Motion To Seal Special Master’s Order Re: Business Partners. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. Attached as **Exhibit A** is a true and correct **redacted** version of Special Master Garrie’s November 2, 2021 Order Re: Business Partners (the “Order”).

3. Attached as **Exhibit B** is a true and correct **unredacted** version of the Order.

4. Facebook’s Amended Responses and Objections to Plaintiffs’ Fourth Set of Interrogatories is attached to the Order as Exhibit F. Facebook designated its responses to Interrogatories 14 and 15 as Highly Confidential—Attorneys’ Eyes Only under the Protective Order in this case. *See* Order Ex. F; Dkt. 122. Facebook’s responses identify third parties with whom Facebook has certain business partnerships, the purposes for which Facebook would partner with these entities, and certain terms of their agreements with Facebook. The responses also reveal information regarding the privacy architecture of Facebook’s code and the capabilities granted or denied to Facebook’s integration partners.

5. The parties’ underlying briefs before Special Master Garrie are attached to the Order as Exhibits I, J, and K. The parties’ briefs contain quotations and descriptions of numerous documents Facebook designated Confidential or Highly Confidential—Attorneys’ Eyes Only under the Protective Order in this case. *See* Order Exs. I, J, K; Dkt. 122. These documents include deposition testimony of Facebook’s Rule 30(b)(6) representatives, internal Facebook communications and presentations discussing Facebook’s business programs and strategies, as well as the terms of a contract between Facebook and a third party.

6. I am informed and believe that the information contained within Facebook’s limited proposed redactions to Exhibits F, I, J, and K to the Order is highly confidential, and if

publicly disclosed, this information could compromise Facebook's business relationships or the relationships with its partners, and may be used by Facebook's competitors to Facebook's commercial disadvantage.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 30, 2021 in Los Angeles, California.



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Alexander Swanson